



## **DCUSA Request for Information (RFI)**

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DIF 041 - DNO Work Upon Meter Terminals, Meter Tails And Customer Tails Following Work Upon Or Change Of DNO Service Equipment

## 1. PURPOSE

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- 1.1. The Distribution Connection and Use of System Agreement (DCUSA) is a multi-party contract between electricity Distributors, electricity Suppliers and Distributed Generators.
- 1.2. The DCUSA Standing Issues Group (SIG) has been established by the DCUSA Panel in accordance with Clause 7.24 of the Agreement. The SIG comprises a cross-section of Industry participants and provides an opportunity for DCUSA Parties to raise and discuss issues relating to the operation of the Agreement.
- 1.3. The objective of the SIG is to review and develop solutions to issues relating to the operation of the DCUSA. The SIG is required to assess the impact of the proposed solutions on the DCUSA and consider them against the DCUSA Objectives. As part of its role, the SIG can carry out Request for Information exercises to seek wider industry views on a DCUSA Issue or proposed solution. Further information on the operation of the SIG is set out in Schedule 7 of the DCUSA.
- 1.4. This document is a Request for Information (RFI) and is issued on behalf of the SIG seeking Industry views on DCUSA Issue Form (DIF) 041 - "DNO Work Upon Meter Terminals, Meter Tails And Customer Tails Following Work Upon Or Change Of DNO Service Equipment".
- 1.5. Parties are invited to consider the questions set out in Section 3 and submit comments using the form attached as Attachment 1 to dcusa@electralink.co.uk by **Friday, 31 October 2014**.

## **2. DIF 041 “DNO WORK UPON METER TERMINALS, METER TAILS AND CUSTOMER TAILS FOLLOWING WORK UPON OR CHANGE OF DNO SERVICE EQUIPMENT”**

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- 2.1. DIF 041 was raised by UK Power Networks to highlight (court case RMISSE1) the elevated risk in relation to the DNO replacement of the service cut out where the meter terminals are disturbed despite best endeavours. This has led to a concern over liability due to acts or omissions which might lead to an increased fire risk at the service termination / metering position. A solution to this issue is required to enable the DNO to discharge its statutory and licence obligations to replace and maintain its systems.
- 2.2. This issue has predominantly been driven due to the outcome of the RMISSE court case which recommended that all metering terminals are tightened on-site. The DCUSA SIG is interested in Parties views on their preferred route to establish the retightening of the metering terminals to ensure the continued safety and integrity of the Distributor/Meter Operator asset chain. A list of potential solutions is set out in the options table below.
- 2.3. This issue is further complicated by the installation of Smart Meters some of which require software temporary anti-tamper alert disabling key codes to be entered on their front terminal covers. DNOs would not have access to these key codes under the planned arrangements for smart nor have any formal basis for being provided with or requesting these key codes. The DCUSA SIG noted that some manufacturers have also added an extra security feature of a special screw driver to get access to the meter. The DCUSA SIG is interested in Parties views on Smart Meter access by a DNO to undertake the work required as part of this issue’s resolution.

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<sup>1</sup> The High Court decision dated 17<sup>th</sup> September 2012 on Case Nos: HT-10-95, HT-10-210, HT-10-??, HT-10-427 and HT-11-163 in respect of "Repair, Installation, Maintenance and Inspection of Supply Side Equipment", Neutral Citation Number: [2012] EWHC 2541 (TCC)

| <b>Options Table</b>  |   |
|---|---|
| <b>DNO Retightening Prior To Re-Energisation</b>  |   |
| <b>Option 1</b>   | <p>DNOs to be consented through a DCUSA Change Proposal to work upon metering systems consequent to modification/replacement of the DNO service equipment, to retighten metering terminals and/or remake meter tail or customer tails, as appropriate, to ensure the safety of the supply equipment. This option would necessitate the provision of Smart Meter software keys to the DNOs to temporarily disable tampering alerts and potentially special screw drivers for certain meter types.</p> <p>This option would ensure that terminals were retightened prior to re-energising the supply and would present the very lowest risk possible with minimum co-ordination.</p>  |
| <b>Supplier Retightening On Second Subsequent Visit Some Time After DNO Re-Energisation</b> |   |
| <b>Option 2</b>   | <p>A means by which the Supplier will ensure that within a short mandatory timescale that the Supplier's agent will later attend site to retighten the metering terminals. In this scenario the provision of Smart Meter temporary tampering alert disabling software keys to DNOs is not required. This option would leave the metering terminals untightened, for a period not under the control of the DNO. Clearly some liability would rest upon the Supplier if retightening of metering terminals was not conducted expeditiously were an incident caused by untightened metering terminals to occur. This we feel presents a higher risk as retightening in all cases will not occur before re-energisation by the DNO.</p> |
| <b>Supplier Retightening On Pre-scheduled Co-attendance Visit Prior To Re-Energisation</b>  |   |
| <b>Option 3</b>   | <p>A means by which the Supplier's agent will attend within a short timescale on a pre-scheduled basis or short notice unscheduled basis at the same time as the DNO such that the Supplier's agent conducts all the retightening of metering terminals. We consider that in the case of Category A and possibly Category B conditions of cut-out or service equipment that there may be no time available in advance to agree a future joint-attendance visit. We consider that the ability of a Supplier's agent and DNO operative to commit and achieve attendance on site within the same time period within the day may</p>  |

be challenging to both parties and not practical to achieve in all cases, creating some potential liability on the DNO if it fails to replace its equipment or retighten the metering terminals and creating some potential liability on the Supplier for failing to retighten the metering terminals in an expeditious fashion. This we feel presents a higher risk as retightening might not occur before re-energisation by the DNO in all cases.

#### **DNO To Leave De-energised Until Subsequent Visit By Meter Operator Who Re-Energises**

##### **Option 4**

A means by which the Supplier will ensure that the Supplier's agent will later attend site to retighten the metering terminals and re-energise the supply. This has an adverse impact on the customer.

### **REQUEST FOR INFORMATION**

Parties are asked to consider the following RFI questions:

- **Question 1:** Are you aware of the issue as described within DIF 041?  
Please provide supporting comments.
- **Question 2:** DNOs: Do you always ensure that the screws at the base of the meter terminal are tight before departing?
- **Question 3:** Suppliers: Are you willing to give consent to other Parties to access the various types of meters (including Dumb meters and Smart meters).  
Please provide your reasoning.
- **Question 4:** Do you understand the intent of the solutions to this DCUSA Issue?
- **Question 5:** Do you agree with solutions 1-4 as set out in the options table?  
Please indicate whether there are any further considerations.
- **Question 6:** Do you have a clear preference for option 1? If yes, please indicate why and whether there are any further considerations?
- **Question 7:** Do you have a clear preference for option 2? If yes, please indicate why and whether there are any further considerations?

- **Question 8:** Do you have a clear preference for option 3? If yes, please indicate why and whether there are any further considerations?
- **Question 9:** Do you have a clear preference for option 4? If yes, please indicate why and whether there are any further considerations?
- **Question 10:** **Under Option 1**, what is your preferred route for allowing DNOs access to the key code for a smart metering terminal in order to undertake the required work?
- **Question 11:** Are there impacts to any other industry codes?
- **Question 12:** Are there any alternative solutions or matters that should be considered?

Responses should be submitted using Attachment 1 to [dcusa@electralink.co.uk](mailto:dcusa@electralink.co.uk) no later than **31 October 2014**.

Responses, or any part thereof, can be provided in confidence. Parties are asked to clearly indicate any parts of a response that are to be treated confidentially.

#### **NEXT STEPS**

The SIG will review the RFI responses with a view to making a recommendation on the progression of DIF 041 to the DCUSA Panel.

If you have any questions about this RFI or about the DCUSA Change Process please contact the DCUSA Help Desk by e-mail at [dcusa@electralink.co.uk](mailto:dcusa@electralink.co.uk) or telephone 020 7432 3017.

#### **ATTACHMENTS**

- Attachment 1 – DIF 041 RFI Response Form
- Attachment 2 – DCUSA Issue Form (DIF) 041 v1.0